

Michael E. Sullivan, Esq. (SBN 5142)
Michael A. Burke, Esq. (SBN 11527)
ROBISON, SHARP, SULLIVAN & BRUST
71 Washington Street
Reno, Nevada 89503
Telephone: (775) 329-3151

Attorneys for Defendant C.H. ROBINSON WORLDWIDE, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLEN M. MILLER,

Case No.: 3:17-cv-00408-MMD-CLB

Plaintiff,

v.

C.H. ROBINSON WORLDWIDE, INC.,
RONEL R. SINGH, RHEAS TRANS, INC.,
and KUWAR SINGH D/B/A RT SERVICE,

DECLARATION OF
MICHAEL A. BURKE, ESQ.
IN SUPPORT OF
C.H. ROBINSON WORLDWIDE, INC.'S
MOTION FOR SUMMARY JUDGMENT

Defendants.

I, MICHAEL A. BURKE, ESQ., being first duly sworn under penalty of perjury,

depose and say:

1. I am an individual over the age of 18 and make the following statements on my own personal knowledge.

2. I am an attorney of record representing C.H. Robinson Worldwide, Inc. ("C.H. Robinson") in this matter.

3. Attached hereto as **EXHIBIT 1**, in support of C.H. Robinson Worldwide, Inc.'s Motion for Summary Judgment ("MSJ") is a true and correct copy of excerpts from the deposition of Bruce Johnson.

4. Attached hereto as **EXHIBIT 2**, in support of C.H. Robinson's MSJ is a true and correct copy of the RMIS Setup SOP produced by C.H. Robinson and as Bates stamp ROBINSON_0182-0317.

5. Attached hereto as **EXHIBIT 3**, in support of C.H. Robinson's MSJ is a true and correct copy of the Agreement for Motor Contract Carrier Services produced by C.H. Robinson

1 as Bates stamp ROBINSON_0112-0122.

2 6. Attached hereto as **EXHIBIT 4** in support of C.H. Robinson's MSJ is a true
3 and correct copy of the Permit produced by C.H. Robinson as Bates stamp ROBINSON_0126.

4 7. Attached hereto as **EXHIBIT 5**, in support of C.H. Robinson's MSJ is a true
5 and correct copy of correspondence and Agreement for Motor Contract Carrier Services produced
6 by C.H. Robinson as Bates stamp ROBINSON_0147-0158.

7 8. Attached hereto as **EXHIBIT 6**, in support of C.H. Robinson's MSJ is a true
8 and correct copy of the information directly from the FMSCSA's website
9 <https://ai.fmcsa.dot.gov/SMS/Search/Index.aspx> of all registered motor carriers with the name
10 "Singh" in its legal name which are located in Sacramento County, California

11 9. Attached hereto as **EXHIBIT 7**, in support of C.H. Robinson's MSJ is a true
12 and correct copy of the information directly from the FMSCA's website
13 <https://ai.fmcsa.dot.gov/SMS/Search/Index.aspx> of all registered motor carriers with the name
14 "Singh" in its legal name which are located in the State of California

15 10. Attached hereto as **EXHIBIT 8**, in support of C.H. Robinson's MSJ is a true
16 and correct copy of excerpts from the deposition of Thomas Corsi, Ph.D.

17 11. Attached hereto as **EXHIBIT 9**, is the Declaration of Bruce Johnson in
18 support of C.H. Robinson's Motion for Summary Judgment.

19 12. Attached hereto as **EXHIBIT 10**, in support of C.H. Robinson's MSJ is a
20 true and correct copy of C.H. Robinson's Contract Addendum and Carrier Load Confirmation
21 produced by C.H. Robinson as Bates stamp ROBINSON_0056-0059.

22 13. Attached hereto as **EXHIBIT 11**, in support of C.H. Robinson's MSJ is a
23 true and correct copy of the Nevada Highway Patrol's MIRT Report produced as Miller_0008561-
24 0008650.

25 14. Attached hereto as **EXHIBIT 12**, in support of C.H. Robinson's MSJ is a
26 true and correct copy of excerpts from the deposition of Sergeant Thomas Jenkins.

27 15. Attached hereto as **EXHIBIT 13**, in support of C.H. Robinson's MSJ is a
28 true and correct copy of excerpts from the deposition of Ronel R. Singh.

DATED: This 25th day of June, 2021.

Robison, Sharp,
Sullivan & Brust
71 Washington St.
Reno, NV 89503
(775) 329-3151